

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**R.M.S. TITANIC, INC.,
successor-in-interest to
Titanic Ventures, limited partnership,
Plaintiff,**

v.

Civil Action No. 2:93cv902

**THE WRECKED AND ABANDONED VESSEL,
ITS ENGINES, TACKLE, APPAREL,
APPURTENANCES, CARGO, ETC., LOCATED
WITHIN ONE (1) NAUTICAL MILE OF A POINT
LOCATED AT 41 43' 32" NORTH LATITUDE
AND 49 56' 49" WEST LONGITUDE,
BELIEVED TO BE THE R.M.S. TITANIC
in rem,
Defendant.**

NOTICE PURSUANT TO LOCAL RULE 7(E)

Pursuant to Local Rule 7(E), the undersigned states as follows:

On August 25, 2023, the United States filed its unopposed motion to intervene. ECF No. 691. Because the motion was unopposed, Plaintiff did not file a response and the time for doing so has now passed. *See* Local Rule (7E). The motion is now ripe for a decision by the Court.

The undersigned has conferred with counsel for the Plaintiff regarding the motion and the United States and Plaintiff believe that the facts and legal arguments are adequately set forth in the pleadings now before the Court, and that because the motion is not opposed oral argument would not aid the decisional process. Accordingly, it is requested that the motion to intervene be decided on the United States' written submission.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By: /s/ Kent P. Porter
Kent P. Porter, VSB No. 22853
Assistant United States Attorney
Attorney for the Intervenor United States
United States Attorney's Office
8000 World Trade Center
101 West Main Street
Norfolk, VA 23510
Tel: 757-441-6331
Fax: 757-441-6689
Email: kent.porter@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of September, 2023, I will electronically file the foregoing document with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Brian Andrew Wainger, VSB #38476 William R. Poynter, VSB #48672 Kaleo Legal 4456 Corporation Lane Suite 135 Virginia Beach, VA 23462 Tel: (757) 96506804 Fax: (757) 304-6175 Email: bwainger@kaleolegal.com Email: wpoynter@kaleolegal.com	David G. Barger, VSB #21652 GREENBERG TRAURIG, LLP 1750 Tysons Boulevard, Suite 1200 McLean, Virginia 22102 Tel: (703) 749-1300 Fax: (703) 749-1301 E-Mail: BargerD@gtlaw.com
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/s/ Kent P. Porter
Kent P. Porter, VSB No. 22853
Assistant United States Attorney
Attorney for the Intervenor United States
United States Attorney's Office
8000 World Trade Center
101 West Main Street
Norfolk, VA 23510
757-441-6331
Fax: 757-441-6689
kent.porter@usdoj.gov